

23CV44594

Verified Correct Copy of Original 10/31/2023.

In The Circuit Court The State Of Oregon For The
County Of Multnomah **Case No:**
wash ouma v. Portland State University
(plaintiff) (Defendant)

FILED MULTNOMAH CO CIRCUIT CT
2023 OCT 30 PM12:05

Date filed:

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Index Of SOME Of The Laws & Authorities Which

I/Plaintiff RELIED On:----- Part iv

-
- 1) Title vi of Civil Rights Acts of the US fed laws prohibits discriminations based on a person's race, color, national origin, religion, disability, sex, etc. PSU **Violated** my rights
 - 2) The 14th Amendments Equal Protection Clause require states to practice equal protection to any persons within its jurisdiction. But PSU has seriously **Violated** mine.
 - 3) The United States 9th Circuit Court has instructed that " courts **must** construe pro se filings **Liberally**", *Hebbe v. Piller* 627 3d 338 342 (9th Circuit Court 2010). I am pro se.
 - 4) Education is a basic human right that works to raise men and women out of poverty, level of inequality, etc . But PSU has **Robbed** and **Denied** me these opportunities in life.
 - 5) Oregon Colleges continue to support Affirmative Action, And PSU is an Oregon College. And Affirmative Action Programs in Higher Education came into existence specifically to rectify the history of race based exclusion. PSU has done **opposite** here.
 - 6) *Brown v. Turner*, 497 So. 2d 1119, 1120 (Ala. 1986). Case goes to a jury if there is "a mere gleam, glimmer, spark, or a scintilla". Here in this matter, I /plaintiff have presented more than enough evidences and facts to back up/support my case against Portland State University.

In The Circuit Court The State Of Oregon For The County Of
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PART I: INTRODUCTION OF THE MATTER:

Portland State University has repeatedly violated my basic civil rights for their own direct or indirect benefits and gains. In other words, PSU has repeatedly practiced **injustices, discriminations, oppressions, biases** etc against me- and as a result have seriously impacted, **harmed**, damaged, injured and hindered my educational, economic, et cetera dreams in life; **2)** And I also believe that PSU/ they have practiced these **Discriminatory** conducts and **Injustices** against me because of my race, ethnicity, color, spiritual faith, etc. **3)** And so I have, very **politely**, repeatedly requested PSU/them to please correct and resolve these **peacefully**- but PSU/they have **IGNORED** and **FAILED** to do so; **4)** And rather than correcting these discriminatory and evil conducts- PSU continue(s) to harm me even much more- and plus with their ongoing **COVER-UPS**.

PART II: STATEMENTS Of FACTS And CLAIM(s) :

1) It was on Monday of August 14,2023- was when I learned for the first time that Portland State University **FAILED** to provide me with proper degree(s) of Bachelor's of Science with Social Science etc degrees- which I qualified and signed up and paid for; b) PSU **FAILED** to award me with the said degree(s) which I was expecting to receive in the mail as they promised me to (Exhib 1,2)

2) a PSU Bachelor's degree requires only total of about **180 credit** hours for any student(s) to get/earn undergraduate degree at/from Portland State University; b) And a PSU Master's degree requires only about **45 credit** hours of graduate courses for master degree

3) I, personally, have already earned a PSU's **227 credit** hours for Bachelor's degrees- and a PSU's **69 credit** hours for **Master** degree

b) And I took all of these courses under the directions, advices and guidance of PSU's academic advisors/experts; c) and these PSU's academic advisors **Assured** me that I have already completed the courses for the degrees I studied for; d) And I have been always

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in a PSU's good academic standing with 3.77 GPA in **Graduate** studies (that is 3.77 GPA in masters studies and courses), Exhib 4,5.

4) Also we (I and my loved ones) financially sacrificed a lot- and worked very hard and paid bills to PSU for all of these academic courses- so that I could earn college degrees which would have been helpful for me in finding good paying jobs to support myself, my loved ones, et cetera; b) Unfortunately, so far a number of my loved ones who sacrificed a lot of their limited resources to help me out through college- have now already passed on/away and **NEVER** got any chance to see me receiving any of the degrees which they sacrificed their limited resources for. But PSU unjustly robbed them these opportunities to see me graduating from college. c) They spent more than \$260,000 toward my college education- but they **NEVER** had a chance to see me graduating.

5) PSU (and its administrative officials) repeatedly, continuously **PROMISED** to give me these degrees, diplomas, and certificates- but they have **NOT** kept any of their promises and words to me.

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6) I have been a student here at PSU for so many years; 7) I do have lots and lots of **evidences** and **witnesses** supporting my case against PSU; b) PSU continues with their ongoing **COVER-ups** as they cause serious/enormous injustices, harms, et cetera on me.

8) Also I suffer a lot as result of these gross violations of my basic rights, and injustices and discriminations committed against me by PSU. In fact PSU has caused and continue to cause me serious-financial burden, financial harms, anxiety, fear, and so forth.

9) Also it hurts a lot because some of my loved ones who also sacrificed so much of their limited resources to help me paying fees for my college education because they wanted to see me graduating from the college- would **NOLONGER** be able to see their/my dreams- because they have already now passed on/away.

10) a) And, by the way, on August 23,2023: I received an e-mail from a PSU Office of the Registrar- that was after I contacted PSU regarding this specific issue (Exhibit 6); b) Here in this said e-mail- its **FALSE & WRONG** when its author/ a PSU official/ Lorenzo now suddenly claims that the completion of a “ University

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study” was required for me to be awarded a Bachelor of Social Science degree; **c)** The fact is I was under **1997 PSU’ Catalogue-** and those under **1997 PSU’ Catalogue** do/did **NOT** need the so-called “university study requirement” to be awarded a Bachelor’s of Science with a Social Science degree; **d)** And even my PSU’s academic advisors repeatedly **ASSURED** me that since I was/am under **1997 PSU Catalogue-** I have already completed all of the required courses- and that I did/do **NOT** need any “university studies” to be awarded a Bachelor’s of Science with Social Science degree(s).

11) Also see Exhibit 6 : this same e-mail where this PSU official continue with their usual **cover-ups** when he “recommends” that I talk with my “academic advisor” - yet it has been PSU’s academic advisors who inform/informed me that I’m under **1997 Catalogue** and that I do **NOT** need to take any university study courses for the said Bachelor’s of Science with Social Science degree, et cetera.

12) And, by the way, again- see Exhibit 6 : an e-mail where its author (a PSU official/Lorenzo) says that they have awarded me a

Bachelor's of Science with a liberal studies major and a **“political science”** minor- but there is **NOWHERE** in this degree/document specifically mentioning any name of “political science” (Exhibit 2)

13) Furthermore, Portland State University caused me and on me a number of other very serious harms, injustices, injuries et cetera: **a)** For example my earliest and trusted PSU academic advisor- who I **relied** on and followed their/his academic advices, direction, leads, guidance- was a very respected former chair, leader, professor, and faculty of PSU CCJ Department (he was Dr. Perlstein); **b)** And through their/ his (Dr. Perlstein's) directions, advices, leads, and guidance, I even registered and took some of his undergraduate and **graduate/master** courses/ classes which he was teaching during his tenure at PSU; **c)** And PSU registrar office gladly charged and collected all of the tuition fees/monies which I paid them for all of these courses; **d)** And by the way, the **Only** reason why I took any of these PSU courses- and reason why my loved ones and I financially **sacrificed** and paid tuition fees and other fees for

all of these college academic courses- including **graduate** courses was to **timely** get college degrees, diplomas, and certificates- as a path/ gateway for me in getting well paying jobs- to really be able to financially support myself and my loved ones after graduating in **time** from PSU; e) But, in **BAD FAITH**, PSU very **unjustly** and unfairly **damaged** and **hindered** the dreams of my loved ones and mine- when, in **BAD FAITH**, PSU **IGNORED** and **FAILED** to provide/award me with degrees, diplomas, and certificates I **timely** worked hard for- including master degrees. Indeed, I have politely and repeatedly asked PSU for these-but PSU, in their **BAD FAITH** continue only with their **COVERUPS** for their own direct and/or indirect benefits, gains, personal interests, and personal gains.

PART III: RELIEF Plaintiff PRAY For:

Therefore, I, plaintiff, pray for judgment against the defendant Portland State University as follows: 1) For Non-economic and/or punitive damages in a sum of \$3,000,000 (three million dollars) or the maximum sum of dollars which a jury would determine to be


reasonable; 2) For economic damages in sum of 2.5 million dollars or the reasonable maximum sum which a jury would determine that plaintiff would have already timely earned if PSU would have **timely** provided/awarded plaintiff/me with academic degrees, diplomas, and certificates as from the time I completed a total of **180 credit** hours of a Bachelor's degree requirement- and/ or **45 credit** hours of a PSU master degree requirement; 3) for any reasonable maximum sum of dollars for pain and suffering, distress etc- which a jury determine that PSU has caused on plaintiff/me.

PART IV: SOME Of The LAWS Plaintiff RELIED On:

- 1) *Title vi of Civil Rights Acts of the US fed laws prohibits discriminations based on a person's race, color, national origin, religion, disability, sex, etc. PSU **Violated** my rights*
- 2) *The 14th Amendments Equal Protection Clause require states to practice equal protection to any persons within its jurisdiction. But PSU has seriously **Violated** mine.*
- 3) *The United States 9th Circuit Court has instructed that " courts **must** construe pro se filings **Liberally**", Hebbe v. Piller 627 3d 338 342 (9th Circuit Court 2010). I am pro se.*
- 4) *Education is a basic human right that works to raise men and women out of poverty, level of inequality, etc . But PSU has **Robbed** and **Denied** me these opportunities in life.*
- 5) *Oregon Colleges continue to support Affirmative Action, And PSU is an Oregon College. And Affirmative Action Programs in Higher Education came into existence specifically to rectify the history of race based exclusion. PSU has done **opposite** here.*

PART V: CONCLUSION:

Therefore plaintiff's prayer is that please a JURY should hold PSU
 Liable and accountable for these said **injustices**. And please find
 for plaintiff/me , and please rule in plaintiff's favor- to prevent/
 stop PSU from causing such injustices/ harms on other voiceless
 students the ways PSU has repeatedly **Violated, Oppressed, and**
Abused my basic human rights and seriously **Harmed** me.

Sincerely submitted,

 wash ouma
 (pro se plaintiff)

October 30, 2023

Certificate Of Service to:
 =====

cc. Dr. Ann Cudd /President
 Portland State University
 PO Box 751
 Portland, Oregon 97207-0751

Wash Ouma
 4110 SE Hawthorne #741
 Portland OR 97214

Exhibit 1

Exhibit #

Portland State University

Portland



Oregon

On recommendation of the University Faculty, and by the authority of the
State of Oregon, Portland State University hereby confers upon

Wash J Ouma

the degree of

Bachelor of Science

Liberal Studies

With all the rights and privileges appertaining thereto. Given on this
Seventeenth Day of June, Two Thousand and Twenty-three.

Gregory K. Amickley
President of the Board

Stacy P.
President of the University

Exhibit 2

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741



PORTLAND STATE USPS

Received On: 8/14/2023

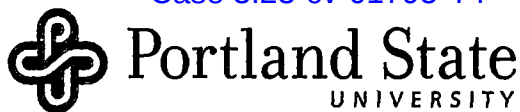
Package Type: Package

Location: Shelf

Customer: WASH OUMA

1	\$2.07 US POSTAGE 4 OZ FIRST-CLASS MAIL FLATS RATE RETAIL	062S0013145694 FROM 23453
		stamps endicia 08/04/2023
USPS FIRST CLASS MAIL®		
Portland State University Degree Requirements Office PO Box 751 Portland OR 97207		0024
SHIP TO: WASH J OUMA		

DO NOT FOLD



Under the Family Educational Rights & Privacy Act (FERPA), the information provided in this document is not to be released to others without the written consent of the student.

ACCREDITATION

Portland State University is accredited by the Northwest Association of Schools and Colleges. In addition, numerous schools, colleges, and departments within the university are accredited by special agencies and associations.

FORMER NAMES

Established in 1946 as Vanport Extension Center, the name changed in 1952 to Portland Extension Center, and in 1955 to Portland State College. On February 14, 1969, the institution was named Portland State University (PSU).

CREDITS

PSU operates on the quarter system. Fall, Winter, and Spring terms are each approximately 11 weeks in length. Summer term courses vary in length from 2 to 13 weeks.

REQUIREMENTS FOR GRADUATION

A baccalaureate degree requires a minimum of 180 quarter hours and a 2.00 GPA. An advanced degree requires a minimum of 45 quarter hours. All advanced degree requirements are listed in the PSU Bulletin. Graduate degrees require a minimum 3.00 GPA.

GRADE POINT AVERAGE (GPA)

No GPA is calculated for students last enrolled prior to Fall 1980. The cumulative GPA is determined by dividing the total quality points by the total credit hours for all terms. Only PSU work is used to calculate the GPA. Transfer credits are for information purposes only, and are not included in the GPA calculation.

CREDIT FOR PRIOR LEARNING (CPL)

CPL is awarded on the PSU institutional transcript for certain courses via examination/challenge and portfolio assessment. CPL is identified by a term notation that says "Credit for Prior Learning: PSU Exam Credit" or "Credit for Prior Learning: Portfolio Asmnt".

COURSE NUMBERING SYSTEM

0-99	Basic courses, no degree credit
100-299	Lower Division
300-499	Upper Division
500-699	Graduate
700	Post-baccalaureate, prof. dev., non-degree credit
800	In-service, prof. dev., limited graduate degree credit
199/299/399	Special Studies

Courses that may be taken repeatedly, with varying credit:

At the 400/500/600 level:

Research	x01	Special Projects	x06
Independent Study	x02	Seminar	x07
Thesis	x03	Workshop	x08
Coop Ed/Intern	x04	Practicum	x09
Reading & Conference	x05	Selected Topics	x10

At the 800 level: 808 and 810

AUTHENTICITY

An official transcript displays the seal of PSU and an official signature. Verification or further explanation of authenticity may be obtained by contacting the Office of the Registrar.

GRADING SYSTEM

Grade	Points	Undergraduate	Graduate
A	4.00	Excellent	Excellent
B	3.00	Good	Satisfactory
C	2.00	Satisfactory	Below Standards
D	1.00	Inferior	Failure (no credit)
F	0.00	Failure	Failure
+/-	0.33	Plus or minus 0.33 points to letter grade, excluding A+, F+, F- (effective Fall 1992)	

MARKING SYSTEM (all disregarded in GPA)

I	Incomplete; mark is permanent after one calendar year
IP	In-Progress; select graduate courses and UNST 421
P	Pass; undergraduate C- or better; graduate B- or better
NP	No Pass
W	Withdrawn with no penalty
X	No Grade Received/No Basis For Grade
Y	Invalid grade reported by instructor
AU	Audit
M	Missing Grade

REPEAT POLICY (undergraduate duplicate courses only)

Credit and GPA are retained on the first A-, B+, B-, C+, C-, and all grades in subsequent attempts count in GPA. The first PSU grade of D or F may be forgiven if repeated at PSU for a differentiated grade (not P/NP). In this case, credit is retained on the last grade received. Both grades are retained on the transcript. If repeated more than once, each subsequent grade will be retained on the transcript and counted in the GPA.

Repeated courses appear under the last column "R" (repeat)

E	Excluded from GPA
I	Included in GPA

COURSE NUMBER SUFFIX CODES

W	Writing Intensive Course (or "WIC" in course title)
H	Honors course
U	University Studies Junior Cluster course

OTHER CODES (Used prior to Summer 1991 on grade labels; appear left of credit hour.)

AUD	Audited Course
R or RPT	Repeated Course
G, L, or GRD	Graduate credit for 400 courses; not used after Summer 1990
H or HON	Honors Course
E	Credit by Examination

Other codes are for internal use only.

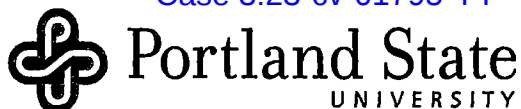
TERM CODES PREVIOUSLY USED

F	Fall	S	Spring
W	Winter	U	Summer

UNIVERSITY STUDIES PROGRAM (established Fall 1994)

The Academic Requirements Committee of the Faculty Senate established that Freshman and Sophomore Inquiry credits transfer to other institutions as indicated below:

One term of UNST 100-level (5 cr)	5 credits general elective
Two terms of UNST 100-level (10 cr)	10 credits general elective
Three terms of UNST 100-level (15 cr)	3 credits writing (WR 121), 4 credits social science, 4 credits science, and 4 credits arts and letters
One term of UNST 200-level (4 cr)	4 credits lower division writing; applies to PSU lower division writing requirement



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Repeated courses appear under the last column "R" (repeat)

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Clarification regarding degree

From: Office of Degree Requirements (degrees@pdx.edu)

To: wjo2@pdx.edu

Cc: waso3psu2@yahoo.com; nmatlick@pdx.edu

Date: Wednesday, August 23, 2023 at 02:17 PM PDT

Hello Wash,

I hope this email finds you well. I'm reaching out to follow up on the questions you had shared with my colleagues at the registrar front desk today.

If I have all my information correct, it sounds like you were asking why a social science major was not awarded to you. It appears the full degree that we awarded was a Bachelor of Science, with a Liberal Studies major, and a political science minor.

If liberal studies is a student's *only* major, the student does not need to complete the University Studies degree requirements.

However, if a student pursues a major alongside a liberal studies major, they must complete the University Studies degree requirements.

According to the audit I ran for a Bachelor's of Science with a Social Science major and Liberal Studies major, you have not completed the University Studies requirements.

As such, we cannot add a Social Science major to your degree program, because the requirements for the whole program are not done.

At this time, I'd recommend working with your academic advisor regarding this matter.

Let me know if you have any questions.

Regards,

Lorenzo

How are we doing? Please take 30 seconds to tell us!

Degree Requirements
Office of the Registrar
Portland State University
(503)725-8340
askdars@pdx.edu

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FILED

23CV44594

2023 NOV -6 AM 10:51
IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF Multnomah

4TH JUDICIAL DIST.

Case No: _____

Wash Duma
Plaintiff

v.

Portland State University
Defendant

CERTIFICATE OF SERVICE

(ORCP 7D(2))

- ☐ (a) Personal Service
☐ (b) Substitute Service
☒ (c) Office Service
☒ (d) Service by Mail

I, (name) Wash Duma, declare that I am a resident of the state of _____.
 I am a competent person 18 years of age or older and not a party to or lawyer in this case. I certify that the person served is the person named below.

I served true copies of the original *Petition, Claim, or Complaint* and *Summons* (with attached notices of mediation and other information provided by the court clerk) and: (name any additional forms served) Exhibits

by (check a, b, c, or d and complete all information):

(a) ☐ **Personal Service** on (date) _____, at _____ a.m./p.m., to
 { ☐ Plaintiff ☐ Defendant } _____ (name) in person at the following
 address _____ in the County of _____
 _____, State of _____.

(b) ☐ **Substitute Service** on (date) _____, at _____ a.m./p.m., by
 delivering them to the following address _____
 in the County of _____, State of _____. Delivered to (name) _____
 _____, who is a person age 14 or older and who lives there.

(Complete the section below only if the server also did the follow-up mailing required by ORCP 7D(2)(b). If a person other than the server did the follow-up mailing, that person must complete a separate Certificate of Service Mailing.)

☒ On (date) October 31, 2023, I personally deposited a true copy of the same documents served with the U.S. Postal Service, via first class mail, in a sealed envelope, postage paid, addressed to the party to be served: ☐ Plaintiff ☒ Defendant Dr. Ann Cudd / President
Portland State University (name), at the party's home address listed above, together with a statement of the date, time and place that the documents were hand-delivered to the party's dwelling (residence).

(c) ☐ **Office Service** on (date) _____, at _____ a.m./p.m., by
 delivering them to the office of the party to be served, located at: _____
 _____ (address), during normal working hours for that office,
 where I left the documents with _____ (name), who is a
 person apparently in charge, to give the documents to the party to be served.

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(Complete the section below only if the server also did the follow-up mailing required by ORCP 7D(2)(c). If a person other than the server did the follow-up mailing, that person must complete a separate Certificate of Service Mailing.)

☐ On (date) _____, I personally deposited a true copy of the same documents served with the U.S. Postal Service, via first class mail, in a sealed envelope, postage paid, addressed to the party to be served: ☐ Plaintiff ☒ Defendant (name) Portland State University, at the party's: ☐ home address at: _____, **OR** ☒ business address above, together with a statement of the date, time and place that the documents were hand-delivered to the party's office.

(d) ☒ **Service by Mail, Return Receipt Requested** on (date) Oct 31/2023, I personally deposited **two** true copies with the U.S. Postal Service. **One** by first class mail, and the **other** by certified or registered mail, Return Receipt Requested, or by express mail, postage paid, addressed to the party to be served: ☐ Plaintiff ☒ Defendant Portland State University (name), at the party's home address located at: 1600 SW 4th Ave suite 840, Portland OR 97201 (address). (NOTE: If mailed Return Receipt Requested, the return receipt must be attached to this Certificate of Service.)

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand they are made for use as evidence in court and I am subject to penalty for perjury.

October 31/2023
Date

[Signature]
Signature of Server
Wash Ouma
Print Name

If person serving is NOT a sheriff or sheriff's deputy, address and phone number of server:

4110 SE Hawthorne # 741 Portland OR 97214

PS. See the attached US Postal certified service to the defendant PSU



BROOKLYN
1410 SE POWELL BLVD
PORTLAND, OR 97202-2398
(800)275-8777

10/31/2023 11:53 AM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$9.65
Flat Rate Env			
Portland, OR 97201			
Flat Rate			
Expected Delivery Date			
Wed 11/01/2023			
Insurance			\$0.00
Up to \$100.00 included			
Certified Mail®			\$4.35
Tracking #:			
70203160000131282585			
Return Receipt			\$3.55
Tracking #:			
9590 9402 7041 1225 9755 11			
Total			\$17.55
Grand Total:			\$17.55
Cash			\$20.00
Change			-\$2.45

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

Preview your Mail
Track your Packages
Sign up for FREE @
<https://informedelivery.usps.com>

All sales final on stamps and postage.
Refunds for guaranteed services only.
Thank you for your business.

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Clerk: 01

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OFFICIAL USE

Certified Mail Fee	\$4.35	0027 01
Extra Services & Fees (check box, add fee as appropriate)	\$3.55	
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00	
<input type="checkbox"/> Return Receipt (electronic)	\$0.00	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00	
<input type="checkbox"/> Adult Signature Required	\$0.00	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00	
Postage	\$9.65	
Total Postage and Fees	\$17.55	
Sent To	Dr. Ann Cudd/President P.S.U.	
Street and Apt. No., or PO Box No.	1600 SW 4th Ave Suite 840	
City, State, ZIP+4®	Portland OR 97201	
PS Form 3800, April 2015 PSN 7530-02-000-9047		See Reverse for Instructions

Postmark Here
OCT 31 2023
10/31/2023
BROOKLYN STATION
PORTLAND, OREGON 97201

7020 3160 0001 3128 2585

2023 NOV 28 AM 10:56

Verified Correct Copy of Original 11/29/2023.

23CV44594

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF Multnomah

Case No: _____

Wash Ouma

Plaintiff

v.

Portland State University

Defendant

CERTIFICATE OF SERVICE

(ORCP 7D(2))

- ☐ (a) Personal Service
☐ (b) Substitute Service
☒ (c) Office Service
☒ (d) Service by Mail

I, (name) Wash Ouma, declare that I am a resident of the state of _____
 I am a competent person 18 years of age or older and not a party
 to or lawyer in this case. I certify that the person served is the person named below.

I served true copies of the original *Petition, Claim, or Complaint* and *Summons* (with attached
 notices of mediation and other information provided by the court clerk) and: (name any
 additional forms served) Exhibits

by (check a, b, c, or d and complete all information):

(a) ☐ **Personal Service** on (date) _____, at _____ a.m./p.m., to
☐ Plaintiff ☐ Defendant } _____ (name) in person at the following
 address _____ in the County of _____
 _____, State of _____.

(b) ☐ **Substitute Service** on (date) _____, at _____ a.m./p.m., by
 delivering them to the following address _____
 in the County of _____, State of _____. Delivered to (name) _____
 _____, who is a person age 14 or older and who lives there.

(Complete the section below only if the server also did the follow-up mailing required by ORCP
 7D(2)(b). If a person other than the server did the follow-up mailing, that person must
 complete a separate Certificate of Service Mailing.)

☒ On (date) October 31, 2023, I personally deposited a true copy of the same
 documents served with the U.S. Postal Service, via first class mail, in a sealed envelope, postage
 paid, addressed to the party to be served: ☐ Plaintiff ☒ Defendant Dr. Ann Cudd / President
Portland State University (name), at the party's home address listed above, together with a statement of
 the date, time and place that the documents were hand-delivered to the party's dwelling
 (residence).

(c) ☐ **Office Service** on (date) _____, at _____ a.m./p.m., by
 delivering them to the office of the party to be served, located at: _____
 _____ (address), during normal working hours for that office,
 where I left the documents with _____ (name), who is a
 person apparently in charge, to give the documents to the party to be served.

(Complete the section below only if the server also did the follow-up mailing required by ORCP 7D(2)(c). If a person other than the server did the follow-up mailing, that person must complete a separate Certificate of Service Mailing.)

☐ On (date) _____, I personally deposited a true copy of the same documents served with the U.S. Postal Service, via first class mail, in a sealed envelope, postage paid, addressed to the party to be served: ☐ Plaintiff ☒ Defendant (name) Portland State University, at the party's: ☐ home address at: _____, **OR** ☒ business address above, together with a statement of the date, time and place that the documents were hand-delivered to the party's office.

(d) ☒ **Service by Mail, Return Receipt Requested** on (date) Oct 31/2023, I personally deposited two true copies with the U.S. Postal Service. **One** by first class mail, and the **other** by certified or registered mail, Return Receipt Requested, or by express mail, postage paid, addressed to the party to be served: ☐ Plaintiff ☒ Defendant Portland State University (name), at the party's home address located at: 1600 SW 4th Ave suite 840, Portland OR 97201 (address). (NOTE: If mailed Return Receipt Requested, the return receipt must be attached to this Certificate of Service.)

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand they are made for use as evidence in court and I am subject to penalty for perjury.

October 31/2023
Date

[Signature]
Signature of Server
Wash Ouma
Print Name

If person serving is NOT a sheriff or sheriff's deputy, address and phone number of server:

4110 SE Hawthorne # 741 Portland OR 97214

Verified Correct Copy of Original 11/29/2023



BROOKLYN
1410 SE POWELL BLVD
PORTLAND, OR 97202-2398
(800) 275-8777

10/31/2023 11:53 AM

Product	Qty	Unit Price	Price
Priority Mail® Flat Rate Env	1		\$9.65
Portland, OR 97201			
Flat Rate			
Expected Delivery Date			
Wed 11/01/2023			
Insurance		\$0.00	
Up to \$100.00 included			
Certified Mail®		\$4.35	
Tracking #:			
70203160000131282585			
Return Receipt		\$3.55	
Tracking #:			
9590 9402 7041 1225 9755 11			
Total			\$17.55

Grand Total: \$17.55

Cash \$20.00
Change -\$2.45

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

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☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

Postage \$9.65

Total Postage and Fees

\$17.55

Sent To: Dr. Ann Cudd/President P.S.U.
Street and Apt. No., or PO Box No. 1600 SW 4th Ave Suite 840
City, State, ZIP+4® Portland OR 97201

PS Form 3800, April 2015 PSN 7530-02-000-9047

See Reverse for Instructions

0027
01



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Dr. Ann Cudd/President
Portland State University
1600 SW 4th Ave, Suite 840
Portland, Oregon 97201



9590 9402 7041 1225 9755 11

2. Article Number (Transfer from service label)

7020 3160 0001 3128 2585

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Jonathan Lebetter Agent
☐ Address

B. Received by (Printed Name)

JONATHAN LEDBETTER 11/1/23

C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restrict Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Signature Confirmation |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | |

Mail
Restricted Delivery
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Domestic Return Receipt

UFN: 406759-0027
Receipt #: 840-59700111-1-6117629-2
Clerk: 01